

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

	)	
In re:	)	
	)	Chapter 11
JOHN ALAN ROSS,	)	
	)	Case No. 5:20-BK-50129
Debtor.	)	
	)	

**MOTION FOR LEAVE TO WITHDRAW  
AND FOR SUBSTITUTION OF COUNSEL**

Kristen E. Burgers and her firm, Hirschler Fleischer, P.C., hereby move this Court pursuant to Local Rule 2091-1 for leave to withdraw as counsel for William A. Truban, Jr. (“Truban”) and Ride On Moto, Inc. (“ROM”) in this case and for the substitution of Augustus C. Epps, Jr. and the firm Williams Mullen in their place and stead as counsel for William A. Truban, Jr. and Ride On Moto, Inc. herein. In support thereof the undersigned represents to this Court as follows:

1. Kristen E. Burgers of Hirschler Fleischer, P.C. is currently counsel of record for Truban and ROM in this case.
2. Truban and ROM wish to secure new counsel to represent their interests in this case.
3. In accordance with the wishes of Truban and ROM, Kristen E. Burgers and Hirschler Fleischer, P.C. seek to withdraw as counsel in order to permit the substitution of Augustus C. Epps, Jr., and Williams Mullen as their counsel of record. Counsel represents that Truban and ROM have been provided reasonable notice of the proposed withdrawal of Ms. Burgers and Hirschler Fleischer as their counsel herein and have consented to the proposed withdrawal and substitution of counsel, as evidenced by the signatures at the foot of this motion.

WHEREFORE, Kristen E. Burgers and Hirschler Fleischer, P.C. move this Court for entry of the attached order permitting them to withdraw as counsel to William A. Truban, Jr., and Ride On Moto, Inc. and substituting Augustus C. Epps, Jr. and the law firm Williams Mullen, P.C. as counsel of record in this case.

August 6, 2020

KRISTEN E. BURGERS and  
HIRSCHLER FLEISCHER, P.C.

/s/ Kristen E. Burgers

Kristen E. Burgers (VSB No.67997)

HIRSCHLER FLEISCHER, P.C.

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*Withdrawing counsel for William A. Truban, Jr.  
And Ride On Moto, Inc.*

AUGUSTUS C. EPPS, JR. and  
WILLIAMS MULLEN

/s/ Augustus C. Epps, Jr.

Augustus C. Epps, Jr. (VSB No. 13254)

WILLIAMS MULLEN

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*Substituting counsel for William A. Truban, Jr.  
And Ride On Moto, Inc.*

In accordance with Local Rule 2091-1, the undersigned, William A. Truban, Jr., and Ride On Moto, Inc., hereby consent to the withdrawal of counsel and the substitution of counsel requested above.

/s/ William A. Truban, Jr.  
WILLIAM A. TRUBAN, JR.

RIDE ON MOTO, INC.

By: /s/ James McCarthy  
Title: President

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of August, 2020, I caused a copy of the foregoing Motion for Leave to Withdraw and for Substitution of Counsel to be served through this Court's CM/ECF system and by first class mail, postage prepaid, on the following:

Andrew S. Goldstein, Esquire  
Magee Goldstein Lasky & Sayers, P.C.  
Post Office Box 404  
Roanoke, VA 24003  
*Counsel for Debtor*

William E. Callahan, Jr., Esquire  
Gentry Locke  
Post Office Box 40013  
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*Subchapter V Trustee*

/s/ Kristen E. Burgers  
Kristen E. Burgers